



May 12, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex parte presentation
FCC 15-49
WT Docket No. 14-170
WT Docket No. 05-211
GN Docket No. 12-268
RM-11395

Dear Secretary Dortch,

On behalf of the Leech Lake Telecommunications Company, a wireless telecommunications company owned by the Leech Lake Band of Ojibwe, a tribal nation, and serving broadband in tribal lands, I express the Board of Director's opinions and wishes with the FCC's "Request for Further Comment on Issues Related to Competitive Bidding Proceedings Updating Part I Competitive Bidding Rules."

The Leech Lake Telecommunications Company does support new rules wherein small businesses affiliated with Tribal Nations or Alaska Native Corporations (ANC) shall not be required to include gaming or government revenues when calculating gross revenues for purposes of determining small business eligibilities; new rules shall recognize only the revenues and assets directly affiliated with the business. Reasoning for this development is to obtain accuracy in determining gross revenues for specific business purposes; the separation of the Band's telecommunication business' revenues from the Band's government and gaming funds, is

190 Sailstar Drive NW, Cass Lake, MN 56633

Telephone: 218-335-7217 • Fax: 218-335-4417

necessary to make an accurate determination. To include all tribal nation funds in calculating gross revenues will provide a miscalculation for business generated gross revenues with this particular FCC eligibility requirement.

The Leech Lake Telecommunications Company does strongly support the continuation of the tribal lands bidding credit. The Board of Directors makes special note that the difficulty referenced here is the Leech Lake Band of Ojibwe's tribal lands and its utilities are distinctly governed by the Leech Lake Band of Ojibwe; not by state and not by county. The FCC has historically neglected tribal land boundaries and jurisdictions with its auctions; more often recognizing county lines, making it difficult for tribes to determine their numbers of served or unserved populations relevant to their tribal lands. Radio spectrum is a natural resource, like timber, water, minerals, and land. The radio spectrum over tribal lands is a natural resource recognized by the Leech Lake Band of Ojibwe. The Leech Lake Telecommunications Company strongly supports a bidding credit for tribal nations be a great value with the intention of returning the spectrum over tribal lands to tribal nations for their own use and governance.

The Leech Lake Telecommunications Company does strongly recommend the unjust enrichment rule make an adjustment particular to spectrum over tribal lands to ensure the licensee who shows no evidence of build out in the first year of the license that such license be made available first to tribal nations.

The Leech Lake Band of Ojibwe is a sovereign Indian nation, wholly governed by its own sovereign governance and is the owner and operator of the Leech Lake Telecommunications Company, LLC.

Respectfully submitted,



Eva Wilson,
Board Chair